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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

JACINTO CORREA CRUZ,

Defendant.

No. 24-CR-568-EKL

STIPULATION AND ~~PROPOSED~~ ORDER
TO CONTINUE CHANGE-OF-PLEA
HEARING

Defendant Jacinto Correa Cruz and the Government, by and through their respective counsel, stipulate and agree, with the Court's approval, that change-of-plea currently set for December 10, 2024 at 10:30 a.m. may be continued to December 17, 2024 at 10:30 a.m. The reason for the requested continuance is so that defense counsel can meet and confer with her client about the plea agreement and so that the parties can continue to confer about the case.

The parties also stipulate and agree that excluding time to December 17, 2024, will allow for effective preparation of counsel. 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by excluding the time from December 10, 2024 to December 17, 2024, outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. §§ 3161(h)(7)(A), (h)(7)(B)(iv).

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STIPULATION AND ~~PROPOSED~~ ORDER
24-CR-568-EKL

1 IT IS SO STIPULATED.

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3 Dated: December 5, 2024

4 _____/s/_____
5 Tamara Crepet
6 Counsel for Defendant

7 Dated: December 5, 2024

8 ISMAIL J. RAMSEY
9 United States Attorney
10 _____/s/_____
11 Anne Hsieh
12 Assistant United States Attorney

13 **[PROPOSED] ORDER**

14 Upon agreement and stipulation of the defendant, and the United States, and their
15 respective counsel, and good cause appearing, IT IS HEREBY ORDERED that defendant
16 Correa Cruz's change-of-plea hearing set for December 10, 2024 at 10:30 a.m. be continued to
17 December 17, 2024 at 10:30 a.m.

18 It is also ORDERED that time may be excluded to December 17, 2024, to allow for the
19 effective preparation of counsel. The Court finds that failing to exclude time to December 17,
20 2024 would unreasonably deny counsel the reasonable time necessary for effective preparation,
21 taking into account the exercise of due diligence. *See* 18 U.S.C. §§ 3161(h)(7)(A), (h)(7)(B)(iv).

22 The Court further finds that the ends of justice served by excluding the time between
23 December 10, 2024 and December 17, 2024, outweigh the interests of the public and the
24 defendant in a speedy trial. 18 U.S.C. §§ 3161(h)(7)(A), (h)(7)(B)(iv).

25 IT IS SO ORDERED.

26 DATED: 12/6/2024

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28 HONORABLE EUMI K. LEE
United States District Judge